

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

Abdi Nazemian, et al.,
Plaintiffs,
vs.

NVIDIA Corporation,
Defendant.

Andre Dubus III, et al.,
Plaintiffs,
vs.
NVIDIA Corp.,
Defendant.

Case No. 4:24-cv-01454-JST
Case No. 4:24-cv-02655-JST

**[PROPOSED] ORDER AFTER CASE
MANAGEMENT CONFERENCE**

Judge: Hon. Jon S. Tigar
Courtroom: 6 - 2nd Floor

[PROPOSED] ORDER AFTER CASE MANAGEMENT CONFERENCE

This matter came before the Court for a case management conference on August 29, 2024. Counsel for all parties appeared. Based on the discussions at the conference and the record in this case, the Court hereby **ORDERS** as follows:

1. The parties are hereby ordered to meet and confer in good faith to discuss and agree upon the selection of up to three (3) Magistrate Judges seated in either the Oakland or San Francisco Divisions of this Court to supervise discovery in this action. In the event the parties are unable to reach an agreement on the selection of a single Magistrate Judge after engaging in good faith meet and confer efforts, they shall file a joint submission informing the Court of their inability to agree.

2. Additionally, once the Court has determined the sequencing of class certification and summary judgment motions, the parties are hereby ordered to meet and confer in good faith to discuss and agree upon a schedule for this case, including deadlines for fact discovery, expert disclosures, and *Daubert* motions. In the event the parties are unable to reach an agreement on the case schedule after engaging in good faith meet and confer efforts, Plaintiffs and Defendant shall each submit the following to the Court on or before **September 9, 2024**:

- Separate proposed case schedules; and
- Briefs, not to exceed 3 pages in length, setting forth their respective positions and arguments in support of their proposed case schedules.

3. The parties are also hereby ordered to meet and confer in good faith to discuss the contents of a proposed protective order and a proposed order setting forth the protocol for discovery of electronically stored information (“ESI”) that shall govern in this action. Should the parties be unable to reach a consensus on the contents of the protective order and/or the ESI protocol order after engaging in good faith meet and confer efforts, Plaintiffs and Defendant shall each submit the following to the Court on or before **September 19, 2024**:

- Separate proposed protective orders, if the parties have not reached an agreement on a joint proposed protective order;
- Separate proposed ESI protocol orders, if the parties have not reached an

1 agreement on a joint proposed ESI protocol order;

- 2 • Briefs, not exceeding ten (10) pages in length, setting forth their respective
3 positions and arguments in support of their proposed protective and/or ESI
4 protocol orders; and
5 • No more than two (2) declarations per side, each not exceeding ten (10) pages in
6 length, providing factual support for their respective positions on the proposed
7 protective and/or ESI protocol orders.

8 4. In the event that Plaintiffs and Defendant submit separate proposed protective orders
9 and/or ESI protocol orders, each side shall have the opportunity to submit a responsive brief addressing
10 the other side's proposals. Plaintiffs and Defendant shall each submit briefs in response, not to exceed
11 five (5) pages in length, on or before **September 26, 2024**.

12 5. The parties shall attend a hearing via Zoom videoconference on **October 16, 2024, at**
13 **9:30 a.m. Pacific Time** to address the proposed protective order and ESI protocol order.

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15 **IT IS SO ORDERED.**

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17 Dated: September 9, 2024

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19 The Honorable Jon S. Tigar
20 U.S. District Court Judge
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